



JENNIFER M. GRANHOLM
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



STEVEN E. CHESTER
DIRECTOR

August 15, 2003

Mr. Jeff Klieve, Chair
Performance Track Participants Association
One Thomas Circle, NW
Tenth Floor
Washington, DC 20005

Dear Mr. Klieve:

Thank you for your recent letter concerning the U.S. Environmental Protection Agency's (USEPA's) Performance Track (PT) Program and the Performance Track Participants Association (PTPA) to Director Steven E. Chester. Director Chester has asked me to respond to your letter and provide you with an overview of our efforts in Michigan to recognize our top environmental performers.

The Michigan Department of Environmental Quality (MDEQ) administers a very similar program to PT called our Clean Corporate Citizen (C3) Program. Our C3 Program, established in 1997, now boasts 73 members, and interest in the program is growing at an increasing rate. Like PT, our voluntary C3 Program offers public recognition and regulatory flexibility to regulated establishments that demonstrate strong environmental performance and a commitment to continual improvement. The C3 is established through administrative rules and requires achievement in three areas: environmental management system (EMS), pollution prevention (P2), and consistent compliance with all applicable environmental laws and regulations. Our regulatory benefits are also contained in administrative rules and include greater permitting flexibility, faster permit reviews, reduced monitoring and reporting in our air and water permitting programs.

The MDEQ supports the ideals behind USEPA's PT program and our staff work with the USEPA in the compliance assessments for PT applicants who are already in the C3 Program. Michigan currently has three recognized PT facilities with two additional applicants currently under review. In addition, C3 staff have been invited to speak at several federal and state conferences on environmental incentive programs, including the 2003 National Performance Track Annual Conference, and the June 2003 Multi-State Work Group Conference. As a result, many states have sought advice from Michigan to establish similar voluntary incentive programs.

We will be conducting a workshop this fall with our current C3 members to look at ways to improve the program and to explore ideas for further incentives for top performing members to go beyond what they have already achieved. At that time, we would be happy to distribute information about your organization. We have no immediate plans to add additional regulatory flexibility benefits to the program, however, we are certainly open to any specific ideas keeping in mind this would undoubtedly require rule change.

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Programs such as C3 and PT have clearly demonstrated that we can improve environmental performance and protect our shared environment as well. We look forward to working with your organization and the USEPA in promoting these innovative programs.

If you need any further information on our C3 Program, please contact Mr. Steve Holmi, Chief, Compliance Assistance Unit, Pollution Prevention and Compliance Assistance Section, Environmental Science and Services Division, at 517-373-1323, or you may contact me.

Sincerely,



Stanley F. Pruss
Deputy Director
517-241-7392

cc: Mr. Steven E. Chester, Director, MDEQ
Mr. Frank Baldwin, MDEQ
Ms. Amy A. Butler, MDEQ
Mr. Steve Holmi, MDEQ